

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

Christian Pressley,

Plaintiff,

v.

Case No. 2021CV000148

Jason Walker, and
City of South Milwaukee,

Defendants.

DECLARATION OF JASMYNE M. BAYNARD

STATE OF WISCONSIN)
) ss
MILWAUKEE COUNTY)

Jasmyne M. Baynard, being first duly sworn under oath, declares and states as follows:

1. My name is Jasmyne M. Baynard. I am an attorney licensed to practice law in the State of Wisconsin and am an attorney with Gunta Law Offices, S.C., which represents Defendants Jason Walker and the City of South Milwaukee in this lawsuit. I make this Declaration based upon my personal knowledge and in Response to Plaintiffs' Motion To Compel. (Dkt. 15)

2. On April 6, 2021 Defendants served their responses to Plaintiff's Discovery Demand, attached hereto as Baynard Exhibit 1.

3. After receiving Defendants' responses and documents, Plaintiff reached out to our office and indicated that he was dissatisfied with Defendants' responses and documents.

4. On April 29, 2021, Defendants supplemented their Responses to Plaintiff's Discovery Demand, attached hereto as Baynard Exhibit 2.

5. When I was assisting in preparation with the Responses to Plaintiff's discovery requests, I was informed by the City's IT personnel that the first Open Records request the City received from the Plaintiff requesting phone calls was on May 14, 2020, which was outside of the 120 day retention period.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated this 5th day of May, 2021.

/s/ Jasmyne M. Baynard
Jasmyne M. Baynard